

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: PROTON-PUMP INHIBITOR
PRODUCTS LIABILITY LITIGATION**

**2:17-MD-2789 (CCC)(MF)
(MDL 2789)
and all member and related cases**

This Document Relates to: ALL ACTIONS

Judge Claire C. Cecchi

**CASE MANAGEMENT ORDER # 4 ON
OCTOBER 11, 2017 STATUS
CONFERENCE**

The Court having held a case management conference on October 11, 2017, and after reviewing the parties' submissions and having discussed various case management issues with the parties, enters the following ORDER:

1. Having received guidance from the Court, the parties shall meet and confer by October 20, 2017 regarding adoption by all parties of an Order concerning Electronically Stored Information ("ESI"). By November 2, 2017, the parties shall submit an agreed Order, or, if the parties are still unable to reach agreement, they shall submit a single Order that includes any competing provisions or two competing Orders, along with simultaneous letter briefs setting forth their positions.

2. Having received guidance from the Court, the parties shall meet and confer by October 26, 2017 regarding a Privilege Log Order. By November 2, 2017, the parties shall submit an agreed Order, or, if the parties are still unable to reach agreement, they shall submit a single Order that includes any competing provisions or two competing Orders, along with simultaneous letter briefs setting forth their positions.

3. With respect to ESI 30(b)(6) depositions, Plaintiffs and AstraZeneca shall meet

and confer by October 20, 2017 regarding the scope and date of such deposition(s).

4. With respect to ESI 30(b)(6) depositions, Plaintiffs and the Pfizer/Wyeth, Takeda, and Procter & Gamble Defendants shall meet and confer regarding the scope and date of such depositions by October 27, 2017.

5. With respect to the other 30(b)(6) depositions noticed by Plaintiffs, the parties shall continue to meet and confer regarding the scope and timing of such depositions.

6. By October 20, 2017, the parties shall meet and confer regarding the document requests served by Plaintiffs on September 26, 2017 and October 3, 2017.

7. The parties shall continue to meet and confer concerning the Proposed Case Management Order Addressing Production of Product Identification and Injury Diagnosis Records by October 20, 2017. By November 2, 2017, the parties shall submit an agreed Order, or, if the parties are unable to reach agreement, they shall submit a single Order that includes any competing provisions or two competing Orders, along with simultaneous letter briefs setting forth their positions. The parties shall continue to meet and confer regarding a Plaintiff Fact Sheet and a Defendant Fact Sheet.

8. The parties shall continue to meet and confer concerning the Direct Filing Order by October 20, 2017. By November 2, 2017, the parties shall submit an agreed Order, or, if the parties are unable to reach agreement, they shall submit a single Order that includes any competing provisions or two competing Orders, along with simultaneous letter briefs setting forth their positions.

9. The parties continue to meet and confer regarding a Scheduling Order.


10. The Court has set dates for the next three case management conferences to be held at 1 p.m. on November 8, 2017; December 18, 2017; and January 12, 2018.

11. The parties shall submit a Joint Status Report and Agenda to the Court by November 2, 2017.

12. Plaintiffs shall arrange for a dial-in number so that interested counsel can listen to future case management conferences.

SO ORDERED:

Dated: Newark, New Jersey
October 24, 2017



CLAIRE C. CECCHI
United States District Judge